1 2 3 4	KEVIN V. RYAN, SBN 118321 United States Attorney JOANN M. SWANSON, 88143 Assistant United States Attorney Chief, Civil Division SARA WINSLOW, DCBN 457643 Assistant United States Attorney	
5 6 7	450 Golden Gate Avenue, Box 3605 San Francisco, California 94102 Telephone: (415) 436-7260 Facsimile: (415) 436-7169	55
8	Attorneys for Defendant	
9	UNITE	ED STATES DISTRICT COURT
10	NORTHE	ERN DISTRICT OF CALIFORNIA
11		OAKLAND DIVISION
12	ALAN HARRISON,	
13	Plaintiff,	CIVIL NO. 06-00321 SBA
14	v.	STIPULATION AND ORDER EXTENDING DEFENDANT'S TIME TO FILE
15	JO ANNE B. BARNHART, Commissioner of Social Security,	RESPONSE TO PLAINTIFF'S  MOTION FOR SUMMARY JUDGMENT
<ul><li>16</li><li>17</li></ul>	Defendant.	
18	IT IS HEREBY STIPULATEI	D by and between the undersigned attorneys, subject to the
19	approval of the Court, that defendant	Commissioner may have an extension of 30 days in which to
20	file her response to plaintiff's motion t	for summary judgment. Defendant's response was due on June
21	30, 2006, pursuant to Civil L.R.16-5.	Defendant's response is now due on July 31, 2006.
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27	///	
28	///	

<sup>&</sup>lt;sup>1</sup> <u>See</u> attached Declaration of Eric K. H. Chinn.

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1	This is defendant's first request.	
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5	Dated: June 23, 2006 /s/ GLENN M. CLARK	
6	Attorney for Plaintiff	
7	KEVIN V. RYAN	
8	United States Attorney	
9		
10		
11		
12	Dated: June 23, 2006  By: /s/ SARA WINSLOW	
13	Assistant United States Attorney	
14	PURSUANT TO STIPULATION, IT IS SO ORDERED:	
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17		
18	Dated: 6/30/03 Saundre B Gemeting	
<ul><li>19</li><li>20</li></ul>	SAUNDRA B. ARMSTRONG	
21	United States District Judge	
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27		
28		
	HARRISON, EXT.MXSJ (ec) C 06-00321 SBA 2	

1 2 3	KEVIN V. RYAN, CSBN 118321 United States Attorney JOANN M. SWANSON, SBN 88143 Assistant United States Attorney Chief, Civil Division SARA WINSLOW, DCBN 457643 Assistant United States Attorney		
4 5 6	Assistant United States Attorney  450 Golden Gate Avenue, Box 36055 San Francisco, California 94102 Telephone: (415) 436-7260 Facsimile: (415) 436-7169		
7 8	Attorneys for Defendant		
9			
10	NORTHERN DISTRICT OF CALIFORNIA		
11	SAN FRANCISCO DIVISION		
12	ALAN HARRISON,		
13	Plaintiff, CIVIL NO. 06-321 SBA		
14	v. ) DECLARATION OF MARY P. PARNOW		
15	JO ANNE B. BARNHART, IN SUPPORT OF DEFENDANT'S REQUEST FOR EXTENSION OF TIME		
16 17	Defendant. )		
18	ERIC K.H. CHINN declares the following:		
19	I am an Assistant Regional Counsel in the Office of the General Counsel for the United		
20	States Social Security Administration ("SSA"), Region IX, am competent and authorized to make this		
21	declaration, and make each statement herein on the basis of my own personal knowledge.		
22	2. This case is actively being reviewed for settlement purposes on behalf of Defendant Jo		
23	Anne B. Barnhart, Commissioner of Social Security.		
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	HARRISON, DECLARATION (ec) C 06-321 SBA		

3. To ensure an adequate opportunity to complete that review and in the interest of promoting settlement, I request a 30-day extension of time to respond to Plaintiff's Motion For Summary Judgment Or Remand.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: San Francisco, California on June 19, 2006.

By /s/ ERIC K. H. CHINN Declarant

HARRISON, DECLARATION (ec) C 06-321 SBA